

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
 )  
 v. ) Criminal No. 16-1006-WGY  
 )  
 KALEEM AHMAD, )  
 Defendant )

## Motion for Order Modifying Conditions of Release

Now comes the Defendant, Kaleem Ahmad, by and through counsel, pursuant to 18 U.S.C. §3142, and hereby moves the Court for an Order modifying the conditions of release imposed in this matter such that Kaleem Ahmad is permitted to travel outside the District of Massachusetts for a two-day vacation with his family to New York City, leaving Massachusetts on July 31, 2016 and returning on August 1, 2016.

Assistant U.S. Attorney Stephen Heymann and U.S. Probation Officer Jeffrey Smith do not object to the request.

WHEREFORE, the defendant respectfully requests that the instant motion be allowed.

July 28, 2016

Respectfully Submitted,

Kaleem Ahmad  
By His Attorney

/s/ William H. Connolly  
William H. Connolly  
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Certificate of Service

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF), including Assistant U.S. Attorney Ted Heinrich, on July 28, 2016.

/s/ William H. Connolly